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Honorable Thomas O. Rice

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON**

JOHN DOE 1; JOHN DOE 2; JANE
DOE 1; JANE DOE 2; JANE DOE 3;
and all persons similarly situated,

Plaintiffs,

v.

WASHINGTON STATE
DEPARTMENT OF CORRECTIONS;
STEPHEN SINCLAIR,

Defendants,

and

BONNEVILLE INTERNATIONAL,
THE MCCLATCHY COMPANY, and
ANDREA KELLY,

Interested Parties.

NO. 4:21-cv-05059-TOR

DEFENDANTS' RESPONSE TO
THE MCCLATCHY COMPANY'S
MOTIONS TO CONTINUE,
DISMISS, TRANSFER AND FOR
COSTS

1 The Defendants have no objection to McClatchy's motions to continue the
2 Plaintiff's Preliminary Injunction and Class Certification motions, Motion to
3 Dismiss, or Motion to Transfer.

4 The Defendants take no position with respect to McClatchy's Motion for
5 Fees and Costs.

6 RESPECTFULLY SUBMITTED this 13th day of May, 2021.

7 ROBERT W. FERGUSON
8 Attorney General

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10 s/ Candie M. Dibble
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